

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In The Matter Of:)	
)	
Creation Of A)	FCC Docket No. RM-11287
Low Power AM Radio Service)	

REPLY COMMENTS OF
TUNETRACKER SYSTEMS, INC.
TO
WRITTEN COMMENTS OF RANGEMASTER TRANSMITTERS, INC.

TUNETRACKER SYSTEMS is a provider of equipment and services to Low Power Radio broadcasters and Part 15 broadcasters.

We are filing these Reply Comments to the Written Comments filed in Docket RM-11287 by RANGEMASTER TRANSMITTERS, INC. of North Carolina.

In its Written Comments, RANGEMASTER TRANSMITTERS has basically asserted that Part 15 AM operations constitute a full substitute for a Low Power AM Radio Service. That is: The company argues Low Power AM stations are not *necessary* because Part 15 AM stations are already available as an alternative.

RANGEMASTER TRANSMITTERS adds that Low Power AM stations are not only unnecessary but *harmful*. The company warns that licensing stations would add seriously disruptive interference to the AM Band.

In response, TUNETRACKER SYSTEMS says this:

(1) TUNETRACKER SYSTEMS supports the speedy approval of a Low Power AM Radio Service -- and we hope to make some money by helping the new LPAM stations to operate and grow.

-2-

(2) While we at TUNETRACKER SYSTEMS know that some Part 15 stations want to stay in the “niche” and size range where they are, it’s also common knowledge here that *many* past and present Part 15 AM broadcasters want to move up to higher wattage and licensed Low Power Radio status.

We won’t speak for the Part 15 AM broadcasters who have this goal.

We’ll let them speak for themselves -- as we’re sure they will, in their own Written Comments to the FCC.

We’ll just say that we know a good number of current broadcasters are running Part 15 AM stations as “the next best thing” until a Low Power AM Radio Service comes along. They think they could do a lot more if they had more wattage -- and we think they’re right.

(3) Finally, about the claim that LPAM stations would cause too much interference:

The same kind of claim was made when LPFM stations were proposed. Congress even bought the argument (unfortunately). It imposed channel spacing restrictions on LPFM. Then the MITRE Corporation study was released, backing up the judgments that the FCC’s engineers had made in the first place, and it became clear that charges of LPFM interference had been just a “boogey man” from the start.

Now Senators McCain, Leahy and Cantwell are trying to repeal the restrictions.

We hope the Commission doesn't make the same mistake with LPAM that Congress made with LPFM. Since the channel spacing restrictions that Congress imposed are limited to Low Power Radio stations on the FM Band, the Commission has a chance to do what makes sense on the AM Band.

Even if the FCC didn't try to limit interference from LPAM stations at all, the interference from LPAM stations would still be only a fraction of the interference that is coming from IBOC stations on the AM Band.

-3-

Anyway, the Petitioners *aren't* talking about giving LPAM stations a "blank check" on wattage, channel spacing or anything else. The LPAM Petitioners have tried very hard to address the interference issue by proposing *assumed* LPAM wattage, for channel spacing purposes, that is 5 to 10 times the *actual* maximum wattage allowed.

Maybe the idea isn't flawless. Maybe there are better ways to approach the interference issue. Still, the Petitioners tried very hard to develop a workable solution, which shows they are sensitive to concerns about the issue.

In The Meantime:

The 5 Petitioners have given you *a reasonable starting point* for your own deliberations on the interference issue. At this point, what else can the Commission ask?

It is the Commission itself that has the final say. Surely, you have the knowledge and the authority to do what you must to prevent disruptive interference from LPAM stations (which are much more likely to be victims of interference than perpetrators of it). You also have the knowledge and the

authority to do what you must to assure that new LPAM Radio stations can co-exist with the Part 15 community rather than displacing it.

Therefore, we urge continued movement toward the establishment of LPAM. Please *keep the process moving*.

Respectfully submitted,

Dane Scott Udenberg

TUNETRACKER SYSTEMS

P.O. Box 222

Oconto, Wisconsin 54153

URL: <http://www.tunetrackersystems.com>

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